

[Submitting Counsel on Signature Page]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

People of the State of California, et al.

v.

Meta Platforms, Inc.; Instagram, LLC; Meta
Payments, Inc.; Meta Platforms Technologies,
LLC,

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION THIS
DOCUMENT RELATES TO:

4:23-cv-05448.

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK
4:23-cv-05448-YGR

**STATE ATTORNEYS GENERAL'S
MOTION FOR RELIEF FROM
NONDISPOSITIVE PRETRIAL ORDER
OF MAGISTRATE JUDGE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Federal Rule of Civil Procedure 72(a), 28 U.S.C. § 636(b)(1)(A), and Civil Local Rule 72, Plaintiff State Attorneys General respectfully submit this Motion for Relief from the Nondispositive Pretrial Order of the Magistrate Judge relating to Discovery Management Order No. 14 Following the Discovery Management Conference of January 16, 2025. (ECF No. 1646).

The State Attorneys General, as chief law enforcement officers in their respective states, have authority to bring enforcement actions independent of other state agencies. The Discovery Management Order No. 14 Following the Discovery Management Conference of January 16, 2025 (ECF No. 1646) (hereinafter, “DMO 14” or “Order”) disrupts this internal state organization by reading Rule 30(b)(6) to require State AGs to provide testimony for multiple distinct state government agencies in the present enforcement action, since each “State” is a “Party,”¹ notwithstanding that those other agencies are uninvolved in this litigation besides Meta’s creative discovery designs. (See Order at 17, 19, and 21).² In the same breath, the Order concludes that there is “no way for Meta to try to take discovery from state agencies by using a 30(b)(6) deposition notice directed to a Plaintiff,” seemingly ignoring the fact that Meta’s Notices defined each “Plaintiff” “State” to encompass 200-plus state agencies and unfamiliar topics, information for which the State AGs would either need to gather from those agencies or designate a testifying witness from those agencies themselves.³

There is no case law, anywhere, concluding that multiple state agencies can be subject to a single Rule 30(b)(6) deposition notice, and DMO 14 does not cite any such authority. *See Bensiek v. Lamone*, No. CV JKB-13-3233, 2017 WL 659929, at *2 (D. Md. Feb. 14, 2017) (“Plaintiffs . . . cited no authority for the notion that a designee for one governmental agency can testify as to the

¹ Neither the State of Maryland nor the State of New Jersey are parties to this suit, but rather, it is each of those states’ respective office of the attorney general that is the named Plaintiff, as well as the New Jersey Division of Consumer Affairs, but DMO 14 nevertheless grouped these states with the other State AG Plaintiffs without explanation.

² DMO 14 wrongly generalizes that every State AG exercises its “parens patriae” authority in pursuing actions under state consumer protection law. (Order at 20); *see, e.g., People v. Ashford Univ., LLC*, 319 Cal. Rptr. 3d 132, 165 (Cal. Ct. App. 2024) (discussing constitutional authority of California State AG, as chief law enforcement officer, to bring consumer protection claims).

³ Topics in Meta’s Amended Rule 30(b)(6) notices which fall entirely outside of the purview of the State AGs include Topics 3, 7, 13, 18 and 19.

knowledge of another governmental agency.”). DMO 14 overlooks the fact that Meta’s Rule 30(b)(6) notices (hereinafter, “Notices”) defined each “State” to include multiple state agencies and does not adequately address how the State AGs would be responsible for either learning that information from state agencies or presenting witnesses from nonparty state agencies for testimony. These legal conclusions and factual findings are both “contrary to law” and “clearly erroneous.” *See* Fed. R. Civ. P. 72(a).

I. Portions of the Magistrate Judge’s Order to Which an Objection is Made

The State AGs object to the portion of DMO 14 discussing 30(b)(6) disputes, specifically the legal issue of whether Meta properly noticed its Rule 30(b)(6) Notices to include multiple state agencies, and the factual issue of whether Meta seeks party discovery from state agencies. (Order at 15–21). DMO 14 concludes that State AGs bringing actions in their independent enforcement authority under state or federal laws are charged with providing party testimony on behalf of the “State,” including with respect to independent state agencies otherwise uninvolved in this case, because the “State” is the “Party.” DMO 14 misapprehends a long-recognized, fundamental feature of state sovereignty: States are free to “allocate authority among different officials who do not answer to one another. . . .” *Berger v. N. Carolina State Conf. of the NAACP*, 597 U.S. 179, 191 (2022); *see, e.g.*, S.C. 2024–25 Appropriation Act, Part IB, § 59.16. States are neither monoliths nor are they corporate conglomerates. DMO 14 ignores the overwhelming weight of relevant federal authority and misunderstands how Meta’s Notices seek agency discovery.

II. Court Action Requested

The State AGs ask the Court to hold that the Magistrate Judge’s conclusion that Meta may notice a single 30(b)(6) deposition to multiple agencies in state law enforcement actions is “contrary to law” and “clearly erroneous.” Fed. R. Civ. P. 72(a). The State AGs ask the Court to deem Meta’s Notices improper under Rule 30(b)(6) and to direct Meta to issue amended, appropriately targeted individual notices and subpoenas to “a governmental agency” directly rather than seeking information through each state as a monolith.

III. Reasons and Authority Supporting the Motion

Under Fed. R. Civ. P. 72(a), a magistrate judge’s order on a non-dispositive motion may be

modified or set aside if its legal conclusions are “contrary to law” or if its factual determinations are “clearly erroneous.” Fed. R. Civ. P. 72(a). “The magistrate’s legal conclusions are reviewed *de novo* to determine whether they are contrary to law.” *Guidiville Rancheria of California v. United States*, No. 12-CV-1326 YGR, 2013 WL 6571945, at *1 (N.D. Cal. Dec. 13, 2013) (citation omitted)). Factual determinations may be overturned under the clear error standard when “the court reaches a ‘definite and firm conviction that a mistake has been committed.’” *Guidiville*, 2013 WL 6571945, at *1 (citation omitted)).

A. One Governmental Agency Cannot be Required to Provide Rule 30(b)(6) Testimony based on the Knowledge of Other Distinct Governmental Agencies

Despite what DMO 14 insinuates, the State AGs have never argued that they were exempt from Rule 30(b)(6) by virtue of their status as law enforcement agencies. (*See* Order at 21). Certainly, Rule 30(b)(6) itself contemplates that “a party may name as the deponent . . . a governmental agency or other entity.” Fed. R. Civ. P. 30(b)(6). But the plain language of Rule 30(b)(6) is phrased in the singular when testimony is from “a governmental agency.” Fed. R. Civ. P. 30(b)(6). That state law enforcement agencies exercising their independent enforcement authority can trigger uninvolved state agencies to be required to provide party testimony finds no support in relevant case law, and neither DMO 14 nor Meta cite any such authority. (*See* Order at 15–21). The few courts that have considered this issue have concluded that “[t]here is no duty imposed [under Rule 30(b)(6)] to inquire into the knowledge of another entity.” *Covington v. Semones*, 2007 WL 1052460, at *1 (W.D. Va. Apr. 5, 2007); *Bensiek*, 2017 WL 659929, at *2 (“It is one thing to find [the State AGs] have the practical ability to obtain documents and basic information from nonparties, [but] it is quite another to expect that they should immerse themselves into another state agency’s records and be able to testify as to that other agency’s knowledge.”).

Courts are even reluctant to require corporate affiliates to provide testimony for a sister company without some requisite showing of factors like self-involvement or centralized decision making. *See In re: Ski Train Fire of November 11, 2000 Kaprun Austria*, 2006 WL 1328259, at *9 (S.D.N.Y. May 16, 2006) (rejecting 30(b)(6) notices to corporate parent seeking subsidiary information because it is not appropriate “to require a corporate parent to acquire all of the

1 knowledge of the subsidiary on matters in which the parent was not involved, and to testify to those
 2 matters in a manner which binds the parent, a separate legal entity”). The only cases Meta can cite
 3 in support are those where these factors are present, namely, **cases following mergers:** *Emhart*
 4 *Indus., Inc. v. Univar USA, Inc.*, 2009 WL 10675670, at *4 (W.D. Wash. Feb. 12, 2009); *Santa*
 5 *Clarita Valley Water Agency v. Whittaker Corp.*, 2020 WL 8102054, at *9 (C.D. Cal. July 9, 2020);
 6 *Int’l Bhd. of Teamsters, Airline Div. v. Frontier Airlines, Inc.*, 2013 WL 627149, at *5 (D. Colo.
 7 Feb. 19, 2013); **cases about contract negotiations:** *Bigsby v. Barclays Cap. Real Est., Inc.*, 329
 8 F.R.D. 78, 82 (S.D.N.Y. 2019); *Oliver v. Greenwell*, 2023 WL 2524901, at *1 (E.D. Mo. Mar. 15,
 9 2023); **cases about retained agents or vendors:** *Anstead v. Va. Mason Med. Ctr.*, 2022 WL
 10 1641425, at *4 (W.D. Wash. May 24, 2022); *Coty Inc. v. Excell Brands, LLC*, 2016 WL 7187630,
 11 at *3 (S.D.N.Y. Dec. 9, 2016); *Calzaturificio S.C.A.R.P.A. s.p.a. v. Fabiano Shoe Co.*, 201 F.R.D.
 12 33, 38 (D. Mass. 2001); **or a case where corporate affiliates shared a president:** *Erenler v. TJM*
 13 *Props., Inc.*, 2022 WL 18492699, at *6 (M.D. Fla. Nov. 7, 2022). Cases Meta may cite about
 14 depositions to the “United States” are inapposite because they either do not concern depositions,
 15 *United States v. Fed. Res. Corp.*, 2012 WL 1623408, at *3 (D. Idaho May 9, 2012) (discussing
 16 litigation holds and documents); or where they do, they do not address the present issue about
 17 independent law enforcement authority and otherwise uninvolved, distinct governmental agencies.
 18 *See United States v. Land O’Lakes, Inc.*, 2018 WL 11411337, at *1 (W.D. Okla. Oct. 24, 2018)
 19 (case brought by U.S. DOJ stemming from EPA investigation). Meta also may cite cases where a
 20 foreign nation has been deemed an “entity” under Rule 30(b)(6), but where the language of 30(b)(6)
 21 expressly identifies “a governmental agency,” those cases do not address whether multiple
 22 governmental agencies can be required to testify under a single Rule 30(b)(6) notice. *See Cont’l*
 23 *Transfert Technique Ltd. v. Fed. Gov’t of Nigeria*, 308 F.R.D. 27, 33–34 (D.D.C. 2015).

24 Here, the State AGs pursued this case in their independent enforcement capacities as set
 25 forth in applicable state and federal law. *Berger*, 597 U.S. at 191. Given the clear weight of relevant
 26 authority, DMO 14’s conclusion that multiple governmental agencies can be subject to party
 27 testimony under a single Rule 30(b)(6) notice in a state law enforcement action is “contrary to law.”
 28 *See Fed. R. Civ. P. 72(a); Bensiek*, 2017 WL 659929, at *2; *Covington*, 2007 WL 1052460, at *1;

1 *In re: Ski Train*, 2006 WL 1328259, at *9.

2 **B. The State AGs are Put in the Impossible Position of Testifying about Other**
 3 **Agencies' Information Not Reasonably Available to the State AGs.**

4 DMO 14 concluded that there is “no way for Meta to try to take discovery of state agencies
 5 by using a 30(b)(6) notice directed to a Plaintiff,” seemingly because the State AGs may designate
 6 whomever they wish to be a witness. (Order at 20). This conclusion does not account for the fact
 7 that Meta defined “State” in its Notices to include information from over 200 agencies that were
 8 ordered last September to produce documents in this litigation⁴, or that the State AGs have no
 9 authority to compel witnesses from those agencies to testify. Nor does it account for the fact that
 10 several topics in Meta’s Notices seek information entirely within the purview of those independent
 11 state agencies such that even if State AGs presented their own witnesses, state agency information
 12 is not reasonably available to them given agencies’ prerogative to refuse cooperation under the
 13 authority of state governors or other separately elected officials, not to mention the sheer volume
 14 of information that would entail reviewing and preparing. *See Bensiek*, 2017 WL 659929, at *2.
 15 Given the scope of Meta’s topics, DMO 14 overlooks how Meta defined State to capture multiple
 16 state agencies in discovery and is thus “clearly erroneous.” *See Fed. R. Civ. P. 72(a)*.

17
18
19
20
21
22
23
24
25 ⁴Meta defines “State” as “including, but not limited to, the executive and legislative branches,
 26 agencies, offices, departments, divisions, commissions, committees, agents, employees, boards,
 27 instrumentalities, vendors (to the extent the State has possession, custody or control over them),
 28 administrators, and other persons or entities acting on behalf of the State, including, but not
 limited to, the agencies and other entities whose information has been deemed within the State’s
 control for purposes of discovery in Magistrate Judge Kang’s September 6 2024 order (ECF No.
 1117) and any other related entities.”

1 Dated: February 19, 2025

Respectfully submitted:

2 **KRIS MAYES**

3 Attorney General
4 State of Arizona

ROB BONTA

Attorney General
State of California

4 /s/ Laura Dilweg

5 Laura Dilweg (AZ No. 036066 CA No. 260663)
6 Chief Counsel – Consumer Protection and
7 Advocacy Section
8 Nathan Whelihan (AZ No. 037560),
9 *pro hac vice*
10 Assistant Attorney General
11 Arizona Attorney General’s Office
12 2005 North Central Avenue
13 Phoenix, AZ 85004
14 Phone: (602) 542-3725
15 Fax: (602) 542-4377
16 Laura.Dilweg@azag.gov
17 Nathan.Whelihan@azag.gov

18 *Attorneys for Plaintiff State of Arizona, ex rel.*
19 *Kris Mayes, Attorney General*

20 **PHILIP J. WEISER**

21 Attorney General
22 State of Colorado

23 /s/ Lauren M. Dickey

24 Lauren M. Dickey (CO Reg. No. 45773)
25 First Assistant Attorney General
26 Megan Paris Rundlet (CO Reg. No. 27474)
27 Senior Assistant Solicitor General
28 Elizabeth Orem (CO Reg. No. 58309)
Assistant Attorney General
Colorado Department of Law
Ralph L. Carr Judicial Center
Consumer Protection Section
1300 Broadway, 9th Floor
Denver, CO 80203
Phone: (720) 508-6651
lauren.dickey@coag.gov

Attorneys for Plaintiff State of Colorado, ex rel.
Philip J. Weiser, Attorney General

/s/ Megan O’Neill

Nicklas A. Akers (CA SBN 211222)
Senior Assistant Attorney General
Bernard Eskandari (CA SBN 244395)
Emily Kalanithi (CA SBN 256972)
Supervising Deputy Attorneys General
Megan O’Neill (CA SBN 343535)
Nayha Arora (CA SBN 350467)
David Beglin (CA SBN 356401)
Joshua Olszewski-Jubelirer
(CA SBN 336428)
Marissa Roy (CA SBN 318773)
Brendan Ruddy (CA SBN 297896)
Deputy Attorneys General
California Department of Justice
Office of the Attorney General
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004
Phone: (415) 510-4400
Fax: (415) 703-5480
megan.oneill@doj.ca.gov

Attorneys for Plaintiff the People of the State
of California

RAÚL R. LABRADOR

Attorney General
State of Idaho

/s/ Nathan Nielson

Nathan H. Nielson (ID Bar No. 9234),
pro hac vice
Deputy Attorneys General
Attorney General’s Office
P.O. Box 83720
Boise, ID 83720-0010
(208) 334-2424
nathan.nielson@ag.idaho.gov

Attorneys for Plaintiff State of Idaho

WILLIAM TONG

Attorney General
State of Connecticut

/s/ Tess E. Shaw

Krislyn M. Launer
(CT Juris No. 440789), *pro hac vice*
Tess E. Shaw
(CT Juris No. 444175), *pro hac vice*
Assistant Attorneys General
Connecticut Office of the Attorney General
165 Capitol Avenue
Hartford, Connecticut 06106
Phone: 860-808-5306
Fax: 860-808-5593
Lauren.Bidra@ct.gov
Krislyn.Launer@ct.gov
Tess.Shaw@ct.gov

Attorneys for Plaintiff State of Connecticut

KATHLEEN JENNINGS

Attorney General
State of Delaware

/s/ Marion Quirk

Marion Quirk (DE Bar 4136), *pro hac vice*
Director of Consumer Protection
Ryan T. Costa (DE Bar 5325), *pro hac vice*
Deputy Director of Consumer Protection
Delaware Department of Justice
820 N. French Street, 5th Floor
Wilmington, DE 19801
Phone: (302) 683-8810
Marion.Quirk@delaware.gov
Ryan.Costa@delaware.gov

Attorneys for Plaintiff State of Delaware

THEODORE E. ROKITA

Attorney General
State of Indiana

/s/ Scott L. Barnhart

Scott L. Barnhart (IN Atty No. 25474-82),
pro hac vice
Chief Counsel and Director of Consumer
Protection
Corinne Gilchrist (IN Atty No. 27115-53),
pro hac vice
Section Chief, Consumer Litigation
Mark M. Snodgrass (IN Atty No. 29495-49),
pro hac vice
Deputy Attorney General
Office of the Indiana Attorney General
Indiana Government Center South
302 West Washington St., 5th Floor
Indianapolis, IN 46203
Telephone: (317) 232-6309
Scott.Barnhart@atg.in.gov
Corinne.Gilchrist@atg.in.gov
Mark.Snodgrass@atg.in.gov

Attorneys for Plaintiff State of Indiana

KRIS W. KOBACH

Attorney General
State of Kansas

/s/ Sarah M. Dietz

Sarah M. Dietz, Assistant Attorney General
(KS Bar No. 27457), *pro hac vice*
Kaley Schrader, Assistant Attorney General
(KS Bar No. 27700), *pro hac vice*
Office of the Attorney General
120 SW 10th Avenue, 2nd Floor
Topeka, Kansas 66612
Telephone: (785) 296-3751
Fax: (785) 296-3131
Email: sarah.dietz@ag.ks.gov

Attorneys for Plaintiff State of Kansas

ANNE E. LOPEZ

Attorney General
State of Hawai'i

/s/ Christopher T. Han

Christopher J.I. Leong (HI JD No. 9662),
pro hac vice

Supervising Deputy Attorney General
Kelcie K. Nagata (JI JD No. 10649),
pro hac vice

Christopher T. Han (HI JD No. 11311),
pro hac vice

Deputy Attorneys General
Department of the Attorney General
Commerce and Economic Development Division
425 Queen Street

Honolulu, Hawai'i 96813

Phone: (808) 586-1180

Christopher.ji.leong@hawaii.gov

Kelcie.k.nagata@hawaii.gov

Christopher.t.han@hawaii.gov

Attorneys for Plaintiff State of Hawai'i

KWAME RAOUL

Attorney General
State of Illinois

/s/ Matthew Davies

Susan Ellis, Chief, Consumer Protection
Division (IL Bar No. 6256460)

Greg Grzeskiewicz, Chief, Consumer
Fraud Bureau (IL Bar No. 6272322)

Jacob Gilbert, Deputy Chief, Consumer Fraud
Bureau (IL Bar No. 6306019)

Matthew Davies, Supervising Attorney,
Consumer Fraud Bureau (IL Bar No. 6299608),
pro hac vice

Kevin Whelan, Supervising Attorney,
Consumer Fraud Bureau (IL Bar No. 6321715),
pro hac vice

Emily Maria Migliore, Assistant Attorney
General, Consumer Fraud Bureau (IL Bar No.
6336392)

Daniel B. Roth, Assistant Attorney General,
Consumer Fraud Bureau (IL Bar No. 6290613)
Office of the Illinois Attorney General

LIZ MURRILL

Attorney General
State of Louisiana

/s/ Asyl Nachabe

Asyl Nachabe (LA Bar No. 38846)
Pro hac vice

Assistant Attorney General
Louisiana Department of Justice
Public Protection Division

Consumer Protection Section

1885 N 3rd Street, 4th Floor

Baton Rouge, LA 70802

Tel: (225) 326-6438

NachabeA@ag.louisiana.gov

Attorney for State of Louisiana

AARON M. FREY

Attorney General
State of Maine

/s/ Michael Devine

Michael Devine, Maine Bar No. 5048,
pro hac vice

Assistant Attorney General
Office of the Maine Attorney General

6 State House Station

Augusta, ME 04333

(207) 626-8800

michael.devine@maine.gov

Attorney for Plaintiff State of Maine

KEITH ELLISON

Attorney General
State of Minnesota

/s/ Caitlin Micko

Caitlin Micko (MN Bar No. 0395388),
pro hac vice

Assistant Attorney General
Office of the Minnesota Attorney General
445 Minnesota Street, Suite 1200

St. Paul, MN 55101-2130

Tel: (651) 724-9180

1 115 S. LaSalle Street
 2 Chicago, Illinois 60603
 3 312-814-8554
 4 Susan.Ellis@ilag.gov
 5 Greg.Grzeskiewicz@ilag.gov
 6 Jacob.Gilbert@ilag.gov
 7 Matthew.Davies@ilag.gov
 8 Kevin.Whelan@ilag.gov
 9 Adam.Sokol@ilag.gov
 10 Emily.Migliore@ilag.gov
 11 Daniel.Roth@ilag.gov

12 *Attorneys for Plaintiff the People of the State of Illinois*

13 **RUSSELL COLEMAN**
 14 Attorney General
 15 Commonwealth of Kentucky

16 /s/ Philip R. Heleringer

17 J. Christian Lewis (KY Bar No. 87109),
 18 *pro hac vice*

19 Philip Heleringer (KY Bar No. 96748),
 20 *pro hac vice*

21 Zachary Richards (KY Bar No. 99209),
 22 *pro hac vice*

23 Daniel I. Keiser (KY Bar No. 100264),
 24 *pro hac vice*

25 Assistant Attorneys General
 26 1024 Capital Center Drive, Ste. 200
 27 Frankfort, KY 40601

28 Christian.Lewis@ky.gov

Philip.Heleringer@ky.gov

Zach.Richards@ky.gov

Daniel.Keiser@ky.gov

Phone: (502) 696-5300

Fax: (502) 564-2698

Attorneys for Plaintiff the Commonwealth of Kentucky

caitlin.micko@ag.state.mn.us

*Attorney for Plaintiff State of Minnesota, by its
 Attorney General, Keith Ellison*

ANDREW BAILEY

Attorney General

State of Missouri

By: /s/ Michael Schwalbert

Michael Schwalbert, *pro hac vice*

Assistant Attorney General

Consumer Protection Section

Missouri Attorney General's Office

815 Olive Street | Suite 200

Saint Louis, Missouri 63101

michael.schwalbert@ago.mo.gov

Phone: 314-340-7888

Fax: 314-340-7981

*Attorney for Plaintiff State of Missouri, ex rel.
 Andrew Bailey, Attorney General*

MATTHEW J. PLATKIN

Attorney General

State of New Jersey

By: /s/ Thomas Huynh

Kashif T. Chand (NJ Bar No. 016752008), *pro hac vice*

Section Chief, Deputy Attorney General

Deputy Attorneys General

Thomas Huynh (NJ Bar No. 200942017),

Pro hac vice

Assistant Section Chief, Deputy Attorney General

New Jersey Office of the Attorney General,
 Division of Law

124 Halsey Street, 5th Floor

Newark, NJ 07101

Tel: (973) 648-2052

Kashif.Chand@law.njoag.gov

Thomas.Huynh@law.njoag.gov

ANTHONY G. BROWN

Attorney General
State of Maryland

/s/ Elizabeth J. Stern

Philip D. Ziperman (Maryland CPF No.
9012190379), *pro hac vice*
Deputy Chief, Consumer Protection Division
Elizabeth J. Stern (Maryland CPF No.
1112090003), *pro hac vice*
Assistant Attorney General
Office of the Attorney General of Maryland
200 St. Paul Place
Baltimore, MD 21202
Phone: (410) 576-6417 (Mr. Ziperman)
Phone: (410) 576-7226 (Ms. Stern)
Fax: (410) 576-6566
pziperman@oag.state.md.us
estern@oag.state.md.us

*Attorneys for Plaintiff Office of the Attorney
General of Maryland*

MICHAEL T. HILGERS

Attorney General
State of Nebraska

/s/ Anna Anderson

Anna Anderson (NE #28080)
Assistant Attorney General
Consumer Protection Bureau
Office of the Nebraska Attorney General
2115 State Capitol Building
Lincoln, NE 68509
Phone: (402) 471-2682
Email: anna.anderson@nebraska.gov

Attorney for Plaintiff State of Nebraska

*Attorney General and the New Jersey Division
of Consumer Affairs*

*Matthew J. Platkin, Attorney General for the
State of New Jersey, and Cari Fais, Director
of the New Jersey Division of Consumer
Affairs*

LETITIA JAMES

Attorney General
State of New York

/s/ Kevin Wallace

Kevin C. Wallace, Senior Enforcement
Counsel
(NY Bar No. 3988482), *pro hac vice*
kevin.wallace@ag.ny.gov
Alex Finkelstein, Assistant Attorney General
NY Bar No. 5609623), *pro hac vice*
alex.finkelstein@ag.ny.gov
Nathaniel Kosslyn, Assistant Attorney General
(NY Bar No. 5773676), *pro hac vice*
nathaniel.kosslyn@ag.ny.gov
New York Office of the Attorney General
28 Liberty Street
New York, NY 10005
(212) 416-8000

*Attorneys for Plaintiff the People of the State
of New York*

DAVE YOST

Attorney General
State of Ohio

/s/ Kevin R. Walsh

Melissa G. Wright (Ohio Bar No. 0077843)
Section Chief, Consumer Protection Section
Melissa.Wright@ohioago.gov
Melissa S. Smith (Ohio Bar No. 0083551)
Asst. Section Chief, Consumer Protection
Section
Melissa.S.Smith@ohioago.gov
Michael S. Ziegler (Ohio Bar No. 0042206)
Principal Assistant Attorney General
Michael.Ziegler@ohioago.gov

JEFF JACKSON

Attorney General
State of North Carolina

/s/ Charles White

Charles G. White (N.C. State Bar No. 57735), *pro hac vice*

Assistant Attorney General
Kunal Choksi

Senior Deputy Attorney General
Josh Abram

Special Deputy Attorney General
N.C. Department of Justice

Post Office Box 629
Raleigh, North Carolina 27602

Telephone: (919) 716-6006

Facsimile: (919) 716-6050

E-mail: cwhite@ncdoj.gov

Attorneys for Plaintiff State of North Carolina

DAVID W. SUNDAY

Attorney General
Commonwealth of Pennsylvania

/s/ John M. Abel

John M. Abel

Senior Deputy Attorney General
(PA Bar No. 47313), *pro hac vice*

Jonathan R. Burns

Deputy Attorney General
(PA Bar No. 315205), *pro hac vice*

Email: jabel@attorneygeneral.gov

Email: jburns@attorneygeneral.gov

Pennsylvania Office of the Attorney General

Strawberry Square, 14th Floor

Harrisburg, PA 17120

Tel: 717.645.7269

Attorneys for Plaintiff the Commonwealth of Pennsylvania

Kevin R. Walsh (Ohio Bar No. 0073999)
pro hac vice

Kevin.Walsh@ohioago.gov
Senior Assistant Attorney General
30 East Broad Street, 14th Floor
Columbus, Ohio 43215
Tel: 614-466-1031

Attorneys for State of Ohio, ex rel. Attorney General Dave Yost

DAN RAYFIELD

Attorney General
State of Oregon

/s/ John Dunbar

John Dunbar (Oregon Bar No. 842100), *pro hac vice*

Assistant Attorney General
Oregon Department of Justice

Consumer Protection Section
100 SW Market Street

Portland, Oregon 97201

Telephone: (971) 673-1880

Facsimile: (971) 673-1884

E-mail: john.dunbar@doj.state.or.us

Attorneys for State of Oregon, ex rel. Dan Rayfield, Attorney General for the State of Oregon

ALAN WILSON

Attorney General
State of South Carolina

/s/ Clark Kirkland, Jr.

C. Havird Jones, Jr.

Senior Assistant Deputy Attorney General

Jared Q. Libet (S.C. Bar No. 74975),

pro hac vice

Assistant Deputy Attorney General

Clark C. Kirkland, Jr. (CA SBN 272522)

Assistant Attorney General

Anna C. Smith (SC Bar No. 104749),

pro hac vice

Assistant Attorney General

PETER F. NERONHA

Attorney General
State of Rhode Island

/s/ Stephen N. Provazza

Stephen N. Provazza (R.I. Bar No. 10435),
pro hac vice

Assistant Attorney General
Rhode Island Office of the Attorney General
150 South Main St.
Providence, RI 02903
Phone: 401-274-4400
Email: SProvazza@riag.ri.gov

Attorney for Plaintiff State of Rhode Island

JASON S. MIYARES

Attorney General
Commonwealth of Virginia

/s/ Joelle E. Gotwals

Joelle E. Gotwals (VSB No. 76779),
pro hac vice

Assistant Attorney General
Thomas J. Sanford
Deputy Attorney General
Richard S. Schweiker, Jr. (VSB No. 34258),
pro hac vice

Senior Assistant Attorney General and
Section Chief

Chandler P. Crenshaw (VSB No. 93452)
pro hac vice

Assistant Attorney General and Consumer
Privacy Unit Manager
Office of the Attorney General of Virginia
Consumer Protection Section
202 N. 9th Street

Richmond, Virginia 23219

Telephone: (804) 786-8789

Facsimile: (804) 786-0122

E-mail: jgotwals@oag.state.va.us

*Attorneys for the Plaintiff Commonwealth of
Virginia ex rel. Jason S. Miyares, Attorney
General*

Post Office Box 11549
Columbia, South Carolina 29211
jlibet@scag.gov
ckirkland@scag.gov
annasmith@scag.gov
803-734-0057

*Attorneys for Plaintiff the State of South
Carolina, ex rel. Alan M. Wilson, in His
Official Capacity as Attorney General of the
State of South Carolina*

MARTY J. JACKLEY

Attorney General
State of South Dakota

/s/ Amanda Miiller

By: Amanda Miiller (SD Bar No. 4271),
pro hac vice

Assistant Attorney General

Bret Leigh Nance (SD Bar No. 4831),
pro hac vice

Assistant Attorney General
1302 East Highway 14, Suite 1
Pierre, SD 57501-8501
Telephone: (605) 773-3215
amanda.miiller@state.sd.us

Attorneys for Plaintiff State of South Dakota

JOHN B. MCCUSKEY

Attorney General
State of West Virginia

/s/ Laurel K. Lackey

Laurel K. Lackey (WVSB No. 10267),
pro hac vice

Abby G. Cunningham (WVSB No. 13388)
Assistant Attorneys General
Office of the Attorney General
Consumer Protection & Antitrust Division
Eastern Panhandle Office
269 Aikens Center
Martinsburg, West Virginia 25404

NICHOLAS W. BROWN
Attorney General
State of Washington

(304) 267-0239
laurel.k.lackey@wvago.gov

/s/ Alexandra Kory
Alexandra Kory (WA Bar No. 49889),
pro hac vice
Joseph Kanada (WA Bar No. 55055),
pro hac vice
Rabi Lahiri
Gardner Reed
Claire McNamara
Assistant Attorneys General
Washington State Office of the Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 516-2997
Alexandra.kory@atg.wa.gov
Attorneys for Plaintiff State of Washington

*Attorneys for Plaintiff State of West
Virginia, ex rel. Patrick Morrissey,
Attorney General*

JOSHUA L. KAUL
Attorney General State
of Wisconsin

/s/ Colin R. Stroud
Colin R. Stroud
Assistant Attorney General
WI State Bar #1119457, *pro hac vice*
Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
(608) 261-9224
stroudcr@doj.state.wi.us

Attorneys for Plaintiff State of Wisconsin